

Institute for Local Self-Reliance  
1313 5<sup>th</sup> St SE, Suite 303  
Minneapolis, MN 55414  
612-276-3456

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(Filed electronically)

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Community Broadband Networks; GN Docket No. 09-51; WC Docket No. 11-59

Dear Ms. Dortch:

On March 15, Christopher Mitchell, Director of the Telecommunications as Commons Initiative at the Institute for Local Self-Reliance met with Matt Warner, Claude Aiken, and Travis Litman to discuss why communities build their own networks and the experiences they have had. Communities typically build their own networks to improve the availability of fast, reliable, and affordable broadband connections. Such networks typically result in lower rates and sometimes increased investment from incumbent operators.

During this meeting, we also discussed whether communities were charging some incumbents higher rates for ROW usage in order to fund their own networks. In my experience, they mostly do not (states often preclude the practice) and charges that they are do are often exaggerated. In particular, I noted that the city of Portland, Oregon, does not offer telecommunications services to private sector companies to my knowledge, though I was clear that my knowledge of that example is limited.

We also discussed how we could achieve near universal fiber-optic connectivity over the next 10 years for less than the \$350 million estimate. Between existing publicly owned networks and cooperatives, the Institute for Local Self-Reliance believes lessons from electrification show that the US could rapidly expand access to fiber-optic networks across the United States. In general, ILSR believes programs that focus on loans for capital expenditures rather than subsidizing operating costs are a more fiscally responsible and effective approach to expanding access to essential infrastructure.

Sincerely,

Christopher Mitchell  
Director, Telecommunications as Commons Initiative